

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In Re:

JOHN WILLIAM CRANNEY AND
NEVENA N. CRANNEY
Debtors

Case No. 13-11220
Chp. 11

**EMERGENCY MOTION TO EXTEND JOAN CHARTERS' TIME TO RESPOND TO
THE TRUSTEE'S OBJECTION TO HER PROOF OF CLAIM, REQUESTING
EXPEDITED DETERMINATION**

Now comes, Carlo Cellai, Esq., attorney of record for the Creditor, Joan Charters in the above-captioned matter, and hereby moves this Honorable Court extend Joan Charters' time to respond to the Trustee's Objection to her proof of claim from June 30, 2014 to July 21, 2014. Due to the fast approaching deadline, counsel respectfully request an expedited determination on his motion.

As grounds therefore, counsel avers that the Creditor, Joan Charters indicated in an email to our office, that she is elderly and ill, and thus unable to currently assist counsel in determining the specifics of her proof of claim. Counsel further avers that his office contacted counsel for the Debtors, John T. Morrier, who denied to assent to this emergency motion to extend the time to respond. Counsel states that the Trustee, the Debtors nor the Creditor will be prejudice by the Court granting Joan Charters an extension to respond to the Trustee's Objection to her proof of claim.

Wherefore, it is respectfully requested that this Motion be allowed and the Creditor, Joan Charters has until **July 21, 2014** to respond to the Trustee's Objection to her proof of claim.

The Plaintiff
Joan Charters,
By her attorney

/s/ Carlo Cellai
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